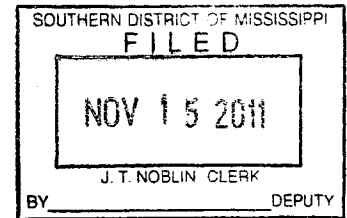


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. *1:11-cr-103-HSD-JMR*

JAVIER MOLINA and
JOSE LUIS SANTOS-GARCIA

18 U.S.C. § 371

The Grand Jury charges:

That from on or about August, 2011, and continuing until on or about November, 2011, in Jackson County in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendants, **JAVIER MOLINA and JOSE LUIS SANTOS-GARCIA**, did knowing and willfully conspire with each other and with others known and unknown to the Grand Jury, to commit offenses against the United States as follows:

Smuggling in violation of Section 554, Title 18, United States Code.

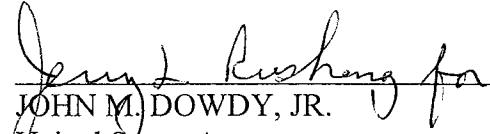
It was a part of the conspiracy that the defendants would fraudulently and knowingly receive, conceal, and facilitate the transportation and concealment of firearms, ammunition, scopes, barrels, gun stocks, flak jackets, and magazines knowing said articles to be intended for exportation from the United States to Mexico, contrary to any law or regulation of the United States.

In furtherance of the conspiracy and to carry out its objectives, the following overt acts, among others, were committed:

1. On August 31, 2011, **SANTOS-GARCIA** drove a motor vehicle in which three (3) flak jackets and two (2) pistols were concealed, from North Carolina with the knowledge that the items would be transported to Mexico.

2. On November 1, 2011, **MOLINA** drove a motor vehicle in which 9 rifles, 5 shotguns, 8 pistols, 902 rounds of ammunition, 16 magazines, 5 shotgun barrels, 6 gun stocks and 2 scopes were concealed with the intent to transport said items to Mexico.

All in violation of Sections 371 and 2, Title 18, United States Code.


JOHN M. DOWDY, JR.
United States Attorney

A TRUE BILL:
S/signature redacted

Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 15th day of November, 2011.


UNITED STATES MAGISTRATE JUDGE